

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO: _____
v.	:	DATE FILED: _____
MICHAEL WRIGHT	:	VIOLATIONS:
RANDALL WRIGHT	:	21 U.S.C. § 846 (conspiracy to possess
	:	with intent to distribute marijuana - 1
	:	count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute marijuana – 1 count)
	:	18 U.S.C. § 924(c) (possession of a firearm
	:	in furtherance of drug trafficking crime -
	:	1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about January 13, 2009, through on or about January 27, 2009,
in Allentown, in the Eastern District of Pennsylvania, defendants

MICHAEL WRIGHT and
RANDALL WRIGHT

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute for remuneration approximately 80 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

MANNER AND MEANS

2. Defendants MICHAEL WRIGHT and RANDALL WRIGHT used their respective apartments located in Allentown, Pennsylvania to store and maintain quantities of marijuana to sell the marijuana to customers.

3. Defendants MICHAEL WRIGHT and RANDALL WRIGHT distributed quantities of marijuana to various customers and maintained the cash drug proceeds inside their respective apartments.

4. In order to protect their drug trafficking activities, defendants MICHAEL WRIGHT and RANDALL WRIGHT kept a number of loaded firearms inside the apartment of defendant RANDALL WRIGHT.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants MICHAEL WRIGHT and RANDALL WRIGHT committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about January 13, 2009, defendant RANDALL WRIGHT distributed approximately one pound of marijuana to another individual in Allentown, Pennsylvania.

On or about January 27, 2009:

2. Inside defendant RANDALL WRIGHT's apartment located at 1028 Hamilton Street, Rear Apartment, Allentown, Pennsylvania, he possessed approximately 40 pounds of marijuana in several large bales, approximately \$6,000 in cash, a scale, approximately 501 tablets of MDMA (Ecstasy), a detailed drug ledger, a grinder, several boxes of plastic bags, and a Motorola cell phone.

3. In addition, defendants MICHAEL WRIGHT and RANDALL WRIGHT stored four loaded firearms and ammunition, inside defendant RANDALL WRIGHT's Allentown apartment, in order to protect the drugs and drug proceeds, including:

- (a) one Masterpiece Arms, .45 caliber machine pistol (MAC 11), bearing serial number A3766, equipped with a silencer, and loaded with 29 rounds of live ammunition;
- (b) one Springfield Armory .40 caliber pistol, bearing serial number US262467, loaded with 10 live rounds of ammunition;
- (c) one Glock Model 30, .45 caliber pistol with an obliterated serial number, loaded with 9 live rounds of ammunition;
- (d) one Davis Industries .22 caliber derringer, bearing serial number 182928, loaded with 1 live round of ammunition; and
- (e) several boxes of ammunition of various calibers.

4. Inside defendant MICHAEL WRIGHT's third floor apartment, located at 26 South Howard Street, defendant MICHAEL WRIGHT possessed approximately 40 pounds of marijuana in one large bale and several bags, approximately \$4,000 in cash, a grinder, and a Motorola cell phone.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**MICHAEL WRIGHT and
RANDALL WRIGHT**

knowingly and intentionally possessed with intent to distribute for remuneration, and aided and abetted the possession with intent to distribute for remuneration of, approximately 80 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**MICHAEL WRIGHT and
RANDALL WRIGHT**

knowingly possessed, and aided and abetted the possession of, a firearms and ammunition, that is:

- (a) one Masterpiece Arms, .45 caliber machine pistol (MAC 11), bearing serial number A3766, equipped with a silencer, and loaded with 29 rounds of live ammunition;
- (b) one Springfield Armory .40 caliber pistol, bearing serial number US262467, loaded with 10 live rounds of ammunition;
- (c) one Glock Model 30, .45 caliber pistol with an obliterated serial number, loaded with 9 live rounds of ammunition;
- (d) one Davis Industries .22 caliber derringer, bearing serial number 182928, loaded with 1 live round of ammunition; and
- (e) several boxes of ammunition of various calibers;

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute marijuana for remuneration, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute marijuana for remuneration, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1), 924(c)(1)(B)(ii),
and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendant

MICHAEL WRIGHT,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate commerce, a firearm and ammunition, that is:

- (a) one Masterpiece Arms, fully automatic .45 caliber machine pistol (MAC 11), bearing serial number A3766, equipped with a silencer, and loaded with 29 rounds of live ammunition;
- (b) one Springfield Armory .40 caliber pistol, bearing serial number US262467, loaded with 10 live rounds of ammunition;
- (c) one Glock Model 30, .45 caliber pistol with an obliterated serial number, loaded with 9 live rounds of ammunition;
- (d) one Davis Industries .22 caliber derringer, bearing serial number 182928, loaded with 1 live round of ammunition; and
- (e) several boxes of ammunition of various calibers.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendants

MICHAEL WRIGHT and RANDALL WRIGHT

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offenses, including, but not limited to:

- (a) one Masterpiece Arms, .45 caliber machine pistol (MAC 11), bearing serial number A3766, equipped with a silencer, and loaded with 29 rounds of live ammunition;
- (b) one Springfield Armory .40 caliber pistol, bearing serial number US262467, loaded with 10 live rounds of ammunition;
- (c) one Glock Model 30, .45 caliber pistol with an obliterated serial number, loaded with 9 live rounds of ammunition;
- (d) one Davis Industries .22 caliber derringer, bearing serial number 182928, loaded with 1 live round of ammunition; and
- (e) several boxes of ammunition of various calibers.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

2. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in this indictment, defendants

**MICHAEL WRIGHT and
RANDALL WRIGHT**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to:

offenses, including, but not limited to:

- (I) the sum of approximately \$10,000 in United States currency;
- (ii) one Masterpiece Arms, .45 caliber machine pistol (MAC 11), bearing serial number A3766, equipped with a silencer, and loaded with 29 rounds of live ammunition;
- (iii) one Springfield Armory .40 caliber pistol, bearing serial number US262467, loaded with 10 live rounds of ammunition;
- (iv) one Glock Model 30, .45 caliber pistol with an obliterated serial number, loaded with 9 live rounds of ammunition;
- (v) one Davis Industries .22 caliber derringer, bearing serial number 182928, loaded with 1 live round of ammunition; and
- (vi) several boxes of ammunition of various calibers; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided with out difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
United States Attorney